

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re: FIELDWOOD ENERGY, LLC, <i>ET</i> <i>AL.</i>, Debtors.¹	§ § § § § § §	Chapter 11 Case No. 20-33948 (MI) (Jointly Administered)
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VERIFIED RULE 2019 STATEMENT OF MULTIPLE PARTY REPRESENTATION

Pursuant to Rule 2019 of the Federal Rules of Bankruptcy Procedure, Husch Blackwell LLP and Chiesa Shahinian & Giantomasi PC (together, “**Counsel**”), file this Verified Rule 2019 Statement of Multiple Representation (“**Verified Statement**”) to provide the following information:

1. Counsel represents Everest Reinsurance Company, Aspen American Insurance Company and Berkley Surety Company.
2. The parties listed in paragraph 1 and on **Exhibit A** are creditors of the Debtors or are parties-in-interest, and the nature and total principal amount of their claims is described on **Exhibit A** attached hereto.
3. Each of the parties listed on **Exhibit A** has consented to this multiple representation by Counsel in the above-captioned matter.

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, as applicable, are: Dynamic Offshore Resources NS, LLC (0158); Fieldwood Energy LLC (6778); Fieldwood Energy Inc. (4991); Fieldwood Energy Offshore LLC (4494); Fieldwood Onshore LLC (3489); Fieldwood SD Offshore LLC (8786); Fieldwood Offshore LLC (2930); FW GOM Pipeline, Inc. (8440); GOM Shelf LLC (8107); Bandon Oil and Gas GP, LLC (9172); Bandon Oil and Gas, LP (9266); Fieldwood Energy SP LLC (1971); Galveston Bay Pipeline LLC (5703); and Galveston Bay Processing LLC (0422). The Debtors’ primary mailing address is 2000 W. Sam Houston Parkway S., Suite 1200, Houston, TX 77042.

4. Counsel reserves the right to amend this Verified Statement in accordance with the requirements set forth in Bankruptcy Rule 2019.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Dated: September 16, 2020.

Respectfully submitted,

HUSCH BLACKWELL LLP

By: /s/ Randall A. Rios

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**ATTORNEYS FOR EVEREST
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BERKLEY SURETY COMPANY**

CERTIFICATE OF SERVICE

I certify that on September 16, 2020, a copy of this document was served by electronic service on all counsel of record via the Court's CM/ECF system.

/s/ Randall A. Ríos

Randall A. Ríos

EXHIBIT A

Name and Address	Nature of Claim against the Debtors	Total Bond Liability (Exclusive of Interest, Costs and Attorneys' Fees)
Everest Reinsurance	Surety Bonds	\$95,570,822.00 ²
Aspen American Insurance	Surety Bonds	\$19,197,079.00
Berkley Surety Company	Surety Bonds	\$74,023,611.20

² Although Bond ES00001441 was written by Everest Reinsurance in the amount of \$75,000,000.00, HCC International Insurance Company PLC ("HCC") assumed \$50 million of the potential penal sum exposure pursuant to that certain Surety Claim Sharing Agreement between Everest Reinsurance and HCC.